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U.S. Department of Justice



United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

April 24, 2015

BY ECF

Honorable Alison J. Nathan United States District Judge Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

Re: <u>United States</u> v. <u>Minh Quang Pham</u>,

12 Cr. 423 (AJN)

Dear Judge Nathan:

The Government respectfully writes, on behalf of the parties, pursuant to the Court's oral Order on April 17 and to provide the Court with an update regarding the defendant's access to electronic discovery.

Following the April 17 conference, counsel for the Government consulted with counsel for the Bureau of Prisons ("BOP") regarding the possibility of providing a laptop to the defendant for the sole purpose of reviewing discovery while he is detained pending trial at the Metropolitan Correctional Center ("MCC"). Counsel for the BOP has agreed to permit the defendant to have access to a laptop computer for this purpose.

In addition, since the April 17 conference, the Government has procured a laptop for the defendant's use and is in the process of re-imaging that laptop and installing the software necessary to permit the defendant to review electronic discovery in this case while at the same time complying with the security requirements of the BOP. The Government expects that it will be able to provide the defendant with the re-imaged laptop by the end of next week.

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The undersigned conferred with Ms. Sternheim, counsel for the defendant, prior to submitting this letter. As always, the undersigned are available to answer any questions the Court may have.

Respectfully submitted,

PREET BHARARA United States Attorney

by: /s/ Sean S. Buckley
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Enclosure

cc: Steven Frankel, Esq.
Counsel for defendant